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**Not for service*

November 19, 2024

BY ECF

Hon. Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *Guerrero-Tabares v. City of New York, et. al.*, 24-cv-6361 (JLR)

Dear Judge Rochon:

I am co-counsel for Plaintiff in the case above. The complaint, initially filed on August 23, 2024, names four “John Doe” defendants – “First Name Unknown” Black and “John Does” 1-3 – collectively, the “Doe Defendants.” *See* ECF 4 (the “Complaint”). The time to serve the Defendants will run in the next few days. I have asked counsel for Defendant City of New York to identify, and provide service information for, the Doe Defendants. However, such discovery in the case is stayed pursuant to Local Civil Rule 83.10 (the “1983 Plan”), as the Court is aware. *See, e.g.*, ECF 11 (denying Plaintiff’s application to remove the case from the 1983 Plan).

I respectfully submit that those circumstances constitute good cause within the meaning of Fed.R.Civ.P. 4(m) to extend the deadline within which to serve the Doe Defendants. Therefore, pursuant to Fed.R.Civ.P. 4(m), I ask that the Court extend the time to serve the Doe Defendants until 90 days after the Doe Defendants are identified and proper service information is provided, or until such time after the Doe Defendants are identified as the Court deems just and proper.

There has been no prior application to extend the deadline. Counsel for Defendant City of New York take no position as to this application as the Law Department does not currently represent the Doe Defendants.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver